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Lenders, Proposed DIP Lenders, and
Stalking Horse Bidder*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RELATIVITY FASHION, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 15-11989 (MEW)

(Joint Administration Requested)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF
NOTICES AND PAPERS BY MILBANK, TWEED, HADLEY & M^cCLOY LLP
AS COUNSEL FOR THE (I) AD HOC GROUP OF TERM LOAN LENDERS;
(II) PROPOSED DIP LENDERS; AND (III) STALKING HORSE BIDDER**

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned cases as counsel for (i) the Ad Hoc Group of Term Loan Lenders; (ii) the proposed DIP Lenders¹; and (iii) the Stalking Horse Bidder² pursuant to 11 U.S.C. § 1109(b) and Federal

¹ As defined in the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing and (B) Use Cash Collateral; (II) Granting the Prepetition Lenders Adequate Protection; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Dkt. No. 23].

² As defined in the Debtors' Motion for (I) an Order (A) Establishing Bidding Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief; and (II) An Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Other Interests, (B) Approving the

Rules of Bankruptcy Procedure 2002, 3017(a), 9007, and 9010, and requests that copies of all notices and papers filed or entered in these cases be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the provisions specified above, but also includes any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement, and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that is filed or given in connection with these cases and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice of appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of the parties in interest (1) to have final orders in non-core matters entered only after de novo review by a United States District Court judge, (2) to trial by jury in any proceeding so triable in this case or

Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief [Dkt. No.25].

any case, controversy, or proceeding related to this case, (3) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to have documents served in accordance with Federal Rule of Bankruptcy Procedure 7004 and Federal Rule of Civil Procedure 4, or to any other rights, claims, actions, defenses, setoffs, or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: July 30, 2015
New York, New York

MILBANK, TWEED, HADLEY & M^cCLOY LLP

By: /s/Dennis C. O'Donnell
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